



Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 11, 2009

Name of company covered by this certification: SkyTerra Subsidiary LLC (**formerly Mobile Satellite Ventures Subsidiary LLC**)

Form 499 Filer ID: 821578

Name of signatory: Jennifer A. Manner

Title of signatory: Vice President, Regulatory Affairs

I, Jennifer A. Manner, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed  (electronic signature)



Description of CPNI Policies and Procedures

Technical and Operational Initiatives

SkyTerra Subsidiary LLC ("SkyTerra") designed a programming update for its billing system that incorporates safeguards that will protect CPNI. These safeguards are accompanied by operating procedures for frontline staff who have system access to the information. The system changes allow SkyTerra to assign passwords to ensure that CPNI is not provided to a caller or a web visitor without authentication of their identity.

Web Site Updates

SkyTerra has enhanced its web activation and web query applications to leverage the CPNI security of SkyTerra's billing system and authentication infrastructures. The system is a secure site which requires User ID and Password and handles password protected self-service web access and web-services access for customers who wish to:

1. View and print invoices and call detail
2. Change password or account information
3. Have lost a password or need help
4. Have a complaint or suggestion about CPNI

Automated System Notification to the Address of Record

The billing system has been programmed to automatically generate notification of password or address of record changes, which are sent to the customer address of record.

Website Process Revisions

The following processes have been revised by SkyTerra so that password access and authentication of callers are required before CPNI is shared:

1. View/Print Invoice or Call Detail
2. New Password or Lost Password
3. Change Password
4. Change Address
5. Credit Card Payment and Pre-Authorized Credit Card Payment



Sales Process

The process for sales to new customers has been revised to ensure that customers are authenticated with photo identification by a dealer during the face to face purchase of the service. The sales contract and terms and conditions have been changed to include: a dealer signature line testifying to the collection of photo identification, and identification detail line, a notification to the customer regarding password protection, and a page describing CPNI authentication requirements.

Dealer Notification

All dealers were notified by mail of SkyTerra's CPNI obligations. In a subsequent email communication, the dealers were invited to CPNI dealer training sessions.

Customer Notification

All customers were notified of SkyTerra's CPNI obligations and initiatives in a letter attached to their November invoice. The notification included the FCC definition of CPNI, SkyTerra's policy to protect CPNI and a description of SkyTerra's CPNI initiatives. The notification also alerted customers to the availability of the password protected website to allow them access to their own CPNI. System encrypted passwords were issued on to customers and mailed via regular first class mail. On December 7, 2007, the self-service web portal became active and the customer service, NOC and finance departments began using passwords to access CPNI.

Training Initiatives: Employee Training on New Policies and Procedures

All employees with direct access to CPNI have been trained on SkyTerra's CPNI policies. Attendance at the training was mandatory for selected employees and documented for all trainees.

Tracking and Investigating Breach of SkyTerra CPNI Obligations

A detailed policy and procedure for investigating breaches of SkyTerra's CPNI obligations has been developed and communicated to employees. The policy includes express disciplinary procedures and reporting mechanisms if a breach in CPNI obligation is identified.